

William B. Abrams
end2endconsulting@gmail.com
1519 Branch Owl Place
Santa Rosa, CA, 95409
Tel: 707 397 5727

Pro Se Claimant and

Party to California Public Utilities Commission Proceeding I.19-09-016 to Consider the Ratemaking and Other Implications of a Proposed Plan for Resolution of Voluntary Case filed by Pacific Gas and Electric Company, pursuant to Chapter 11 of the Bankruptcy Code, in the United States Bankruptcy Court, Northern District of California, San Francisco Division, In re Pacific Gas and Electric Corporation and Pacific Gas and Electric Company, Case No. 19- 30088.

Party to California Public Utilities Commission Proceeding I.15-08-019 to Determine whether Pacific Gas and Electric Company and PG&E's Corporation's Organizational Culture and Governance Prioritizes Safety

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

-and-

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankr. Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administrated)

**DECLARATION OF WILLIAM B.
ABRAMS IN SUPPORT OF *EX*
PORTE MOTION OF WILLIAM B.
ABRAMS PURSUANT TO B.L.R.
9006-1 REQUESTING ORDER
SHORTENING TIME FOR HEARING
ON WILLIAM B. ABRAMS MOTION
FOR RECONSIDERATION AND
RELIEF FROM THE ORDERS
PURSUANT TO U.S.C. §§ 363(b) AND
105(a) AND BANKRUPTCY RULE
9024 APPROVING THE PARTIES'
JOINT STIPULATION REGARDING
THE REGISTRATION RIGHTS
AGREEMENT AND RELATED
AGREEMENTS OF THE FIRE
VICTIM TRUST**

Related Documents: Dkt. 7974

1 I, William B. Abrams, pursuant to section 1746 of title 28 of the United States Code,
2 hereby declare under penalty of perjury that the following is true and correct to the best of my
3 knowledge, information, and belief:

4 1. I am a claimant and a PG&E Fire Survivor who has engaged in this proceeding as a
5 Pro Se party to promote and collaborate with core parties in good-faith towards a plan that provides a
6 restructured PG&E oriented towards safe and reliable service as well as just settlements for all
7 claimants.

8 2. I submit this declaration in support of this Motion (the “**Motion to Shorten**”),
9 pursuant to Rule 9006-1 of the Bankruptcy Local Rules for United States District Court for the
10 Northern District of California (the “Bankruptcy Local Rules”), for entry of an order shortening time
11 for a hearing on Friday, June 19, 2020 at 10:00 a.m. (prevailing Pacific Time), on the *WILLIAM B.*
12 *ABRAMS MOTION FOR RECONSIDERATION AND RELIEF FROM THE ORDERS PURSUANT*
13 *TO U.S.C. §§ 363(b) AND 105(a) AND BANKRUPTCY RULE 9024 APPROVING THE PARTIES’*
14 *JOINT STIPULATION REGARDING THE REGISTRATION RIGHTS AGREEMENT AND RELATED*
15 *AGREEMENTS OF THE FIRE VICTIM TRUST* (“**Motion for Reconsideration**”), filed
16 contemporaneously herewith.¹ William B. Abrams requests that any responses or objections to the
17 Motion for Reconsideration be in writing and filed with the Court and served by 4:00 p.m. (prevailing
18 Pacific Time) on Thursday, June 18, 2020.

19 3. I believe that approval of the Motion for Reconsideration as described therein is
20 particularly time-sensitive, given the pending plan confirmation decisions before the court and the
21 reliance upon the Registration Rights Agreement and Associated Agreements to ensure the efficacy
22 of the plan and just outcomes for victims. As described in the Motion to for Reconsideration and
23 within the Motion to Shorten Time, there is ample evidence that there are violations of U.S.C. §§
24 1129(a)(8) and 1129(b). To whatever extent there is uncertainty and disputes regarding these
25 violations, these differences need to be resolved quickly to ensure the integrity and timely
26 confirmation of the Plan by June 30, 2020 set by AB 1054.

27 ¹ Capitalized terms used but not defined herein have the meanings ascribed to them in the Motion to Designate
28 Votes or the Motion to Shorten, as applicable.

1 4. I believe that prompt resolutions of these violations are in the best interest of all
2 parties and in particular the victim claimants who are a priority for this court. I believe that the
3 timeframe stipulated in the Motion to Shorten provides adequate time for all parties to file objections
4 and to have substantive oral arguments on June 19, 2020. The core parties to this proceeding have
5 spent considerable time in closed door mediation regarding these agreement so should be prepared to
6 argue their positions in this matter.

7 5. As set forth in the Motion to Shorten and because the Motion for Reconsideration
8 addresses material issues for plan confirmation decisions, I am requesting this timeframe so that these
9 issues will not unduly delay or derail confirmation decisions or recoveries to Fire Victims under the
10 Plan. Indeed, a prompt hearing on the Motion is warranted and appropriate. I have put forward the
11 Motion for Reconsideration in good-faith to remedy these material issues for all parties and in
12 particular for PG&E Fire Victims who deserve a fair, prompt and just resolution pursuant to U.S.C.
§§ 1129(a)(8) and 1129(b).

13 6. After the court hearing on June 16, 2020, in which the Motion for Reconsideration
14 was advised as the proper method to bring these matters before the court, I sent emails to the Debtors,
15 the Official Committee of Tort Claimants (“TCC”) and the Official Committee of Unsecured
16 Creditors (“UCC”) asking for their support and/or to meet and confer on these issues. I received a
17 response from Mr. Bray on behalf of the UCC indicating that “The UCC supports the relief requested
18 by the Debtors. Consequently, we will oppose any motion for reconsideration” (A true and correct
19 copy of that email is attached hereto as **Exhibit A**). Subsequently, I received a response from Mr.
20 Julian yesterday on behalf of the TCC indicating “I will review this in the morning” and have not
21 received any additional correspondence on behalf of the TCC (A true and correct copy of that email
is attached hereto as **Exhibit B**). I have not received any response from the Debtors to date.

22 I declare under penalty of perjury that, to the best of my knowledge and after
23 reasonable inquiry, the foregoing is true and correct and that this declaration was executed at Santa
24 Rosa, California on June 17, 2020.

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William B. Abrams
Pro Se Claimant